

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK**

Amy Crum,

Plaintiff,

v.

United Financial Services, LLC; and DOES 1-  
10, inclusive,

Defendants.

:  
:  
: Civil Action No.: 1:14-cv-00148-JTC  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

**DECLARATION OF AMY CRUM IN SUPPORT OF MOTION FOR DEFAULT  
JUDGMENT AGAINST DEFENDANT UNITED FINANCIAL SERVICES, LLC**

Pursuant to 28 U.S.C. § 1746, Amy Crum hereby declares as follows:

1. My name is Amy Crum and I am a resident of West Seneca, New York, in Erie County.
2. I incurred a financial obligation which was primarily for personal purposes (the "Debt")
3. In or around October 2013, a company I understand to be a debt collector, United Financial Services, LLC ("United"), began calling me in an attempt to collect the Debt.
4. During that conversation, a representative from United threatened me with a lawsuit and further threatened me with imprisonment if I did not pay the Debt.
5. To date, I have not been served with any lawsuit and I am not aware of any litigation initiated against me, nor have I been arrested for the Debt.
6. Additionally, during one of the conversations a representative from United threatened to call my friends and my neighbor and tell them I owe a Debt in order to coerce me into immediate payment of the Debt.

7. As a direct consequence of United's conduct, I suffered and continue to suffer from humiliation, anger, anxiety, emotional distress, fear, and embarrassment.

8. Since I had the initial conversation with United in October 2013, I still suffer from fear of being confronted by my family members or my neighbor about a telephone call from United about my Debt.

9. If United were to call my family members or neighbor and disclosed such personal details of my life, I would be quite humiliated and embarrassed, and a thought of this happening causes me stress.

10. Further, United's threat to have me arrested causes me a lot of anger, since now I understand that United has no actual power under the law to cause my arrest merely for not satisfying a consumer debt. But I did not have such understanding at the time United made its threat, which caused me to suffer emotional distress.

I declare under penalty of perjury under the laws of the State of New York that the foregoing is true and accurate to the best of my knowledge.

Executed on 10<sup>th</sup> day of September, 2014.

  
Amy Crum